

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
FOURTH DIVISION

US EPA RECORDS CENTER REGION 5



515508

UNITED STATES OF AMERICA,

Civil No. 4-80-469

Plaintiff,

and

STATE OF MINNESOTA, by its
Attorney General Hubert H.
Humphrey, III, its Department
of Health, and its Pollution
Control Agency,

Plaintiff-Intervenor

vs.

REILLY TAR & CHEMICAL CORPORATION;
HOUSING AND REDEVELOPMENT AUTHORITY
OF ST. LOUIS PARK; OAK PARK VILLAGE
ASSOCIATES; RUSTIC OAKS CONDOMINIUM,
INC.; and PHILLIP'S INVESTMENT CO.,

Defendants,

and

CITY OF ST. LOUIS PARK,

Plaintiff-Intervenor,

vs.

SUPPLEMENTAL RESPONSE
OF REILLY TAR & CHEMI-
CAL CORPORATION TO
INTERROGATORY NO. 4 OF
THE CITY OF ST. LOUIS
PARK (DATED MAY 18, 1983)

REILLY TAR & CHEMICAL CORPORATION,

Defendant,

and

CITY OF HOPKINS,

Plaintiff-Intervenor,

vs.

REILLY TAR & CHEMICAL CORPORATION,

Defendant.

Reilly Tar & Chemical Corporation ("Reilly") hereby supplements its response to Interrogatory No. 4 of the City of St. Louis Park (dated May 18, 1983) to also include the following:

As stated in Reilly's original answer, because discovery and trial preparation are still not complete, a complete answer to this interrogatory cannot be given at this time. As an additional partial response, however, see the factual discussions in the Memorandum of Reilly Tar & Chemical Corporation in Opposition to the United States' and State of Minnesota's Joint Motion for Partial Summary Judgment on Defendant Reilly Tar & Chemical Corporation's Fourth Affirmative Defense to the United States' Complaint and Fifth Affirmative Defense to the State's Complaint (Unconstitutionality of CERCLA), and the affidavits submitted in support thereof.

Dated: March 22, 1984.

REILLY TAR & CHEMICAL CORPORATION

By _____
Carl F. Leshner,
Vice President